

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

ODIL SHARIPOV,

Defendant.

**SEALED INDICTMENT**

23 Cr.

93 CRIM 945

**COUNT ONE**  
**(Conspiracy to Commit Money Laundering)**

The Grand Jury charges:

1. From at least in or about 2017 through at least in or about 2018, in the Southern District of New York and elsewhere, ODIL SHARIPOV, the defendant, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit money laundering, in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 1957.

2. It was a part and an object of the conspiracy that ODIL SHARIPOV, the defendant, and others known and unknown, knowing that the property involved in a financial transaction represented the proceeds of some form of unlawful activity, would and did conduct and attempt to conduct such a financial transaction, which transaction affected interstate and foreign commerce and involved the use of a financial institution which was engaged in, and the activities of which affected, interstate and foreign commerce, and which in fact involved the proceeds of specified unlawful activity, to wit, wire fraud, in violation of Title 18, United States Code, Section 1343, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

3. It was a further part and an object of the conspiracy that ODIL SHARIPOV, the defendant, and others known and unknown, within the United States, would and did knowingly engage and attempt to engage in a monetary transaction, as defined in Title 18, United States Code, Section 1957(f)(1), in criminally derived property of a value greater than \$10,000 that was derived from specified unlawful activity, to wit, wire fraud, in violation of Title 18, United States Code, Section 1343, in violation of Title 18, United States Code, Section 1957.

(Title 18, United States Code, Section 1956(h).)

**COUNT TWO**  
**(False Statements)**

The Grand Jury further charges:

4. On or about July 29, 2022, in the Southern District of New York and elsewhere, ODIL SHARIPOV, the defendant, in a matter within the jurisdiction of the executive branch of the Government of the United States, knowingly and willfully made a materially false, fictitious, and fraudulent statement and representation, to wit, during an interview with Special Agents from the Federal Bureau of Investigation and in a subsequent email to the Special Agents, SHARIPOV falsely stated that he had sold a specific vehicle to another person ("CC-1"), when in truth and in fact, SHARIPOV never sold CC-1 this vehicle.

(Title 18, United States Code, Sections 1001(a)(2) and 2.)

**FORFEITURE ALLEGATIONS**

5. As a result of committing the offense alleged in Count One of this Indictment, ODIL SHARIPOV, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any and all property, real and personal, involved in said offenses, or any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of property involved in said offense.

**Substitute Assets Provision**

6. If any of the above-described forfeitable property, as a result of any act or omission of ODIL SHARIPOV, the defendant:

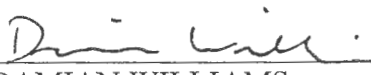
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982, Title 21, United States Code, Section 853, and Title 28, United States Code, Section 2461.)

  
FOREPERSON

  
DAMIAN WILLIAMS  
United States Attorney